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December 28, 2009

## ***VIA UPS OVERNIGHT***

Gail Mitchell, Deputy Director  
Water Protection Division  
U.S. EPA Region 4  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, Georgia 30303-8960

**Re: October 6, 2009, Information Request – Section 308 of the Clean  
Water Act - Dalton Utilities Land Application System**

Dear Ms. Mitchell:

Enclosed with this letter is information from Dalton Utilities in response to EPA's October 6, 2009, Section 308 of the Clean Water Act request (the "Request") addressed to Mr. Don Cope, President and CEO of Dalton Utilities. The enclosure is a letter dated December 23, 2009, with a certification signed pursuant to the Request and information responsive to Paragraph 9 of Enclosure A **Monthly Progress Report**.

Please contact me if have any questions regarding the information supplied pursuant to the Request.

Sincerely,



Lee A. DeHihns, III

LAD:gba  
Enclosures

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December 23, 2009

Ms. Gail Mitchell, Deputy Director  
Clean Water Enforcement Branch  
Water Protection Division  
U.S. Environmental Protection Agency, Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

Re: Information Request Pursuant to Section 308 of the Clean Water Act  
Monthly Progress Report

Dear Ms. Mitchell,

In accordance with the Information Request pursuant to Section 308 of the Clean Water Act dated October 6, 2009, Dalton Utilities is submitting this Monthly Progress Report. This report is being submitted to you early to due to the upcoming holiday.

Dalton Utilities submitted the Drinking Water Well Survey (Drinking Water Report), Drinking Water Well Monitoring Report, Composted Biosolids Monitoring Plan, Compost Use Review Report, and Well Construction Records on November 4, November 5, November 2, November 2, and October 23, 2009, respectively, in response to the aforementioned Information Request. Dalton Utilities is currently awaiting comments from the United States Environmental Protection Agency (EPA) regarding these submissions.

As it pertains to the Private Drinking Water Well Monitoring Report, Dalton Utilities has submitted to EPA all the final analytical reports for the private drinking water wells sampled as a part of the initial drinking water well survey. Dalton Utilities has instituted the required quarterly sampling of the seven locations shown to have levels of PFOA or PFOS above the contract laboratory's reporting limit or level of quantification and below the published public health advisory level. Also, in accordance with your comments during the December 7, 2009, conference call between representatives of EPA and Dalton Utilities, the two additional locations found to have levels of Perfluorinated chemicals (PFC) other than PFOA or PFOS above the contract laboratory's reporting limit or level of quantification were recently re-sampled and will be added to the scheduled quarterly sampling along with the original seven locations. As always, Dalton Utilities will submit the final analytical reports for these sampling events to EPA within five days of receipt from the contract laboratory. Further, the letters sent to the residents where private

drinking water wells were sampled as part of the initial drinking water well survey are attached herein as Attachment A.

Pertaining to the Composted Biosolids Monitoring Plan, samples were collected of the three batches of compost aged approximately 6, 12, and 18 months at the time of the August 5, 2009, correspondence to Mr. Hom. Additionally, samples of the locations stipulated in the aforementioned Information Request's Enclosure A, Paragraph 5 were collected before November 1, 2009, and submitted to a contract lab for analysis. Dalton Utilities is awaiting the results of these sampling events and will submit all final analytical reports received from the contract laboratory to EPA which includes the respective chain of custody, analytical results, quality assurance performance results, laboratory detection and reporting limitations, and laboratory methods utilized in analyzing said samples. These locations are scheduled to be sampled again in January 2010.

Dalton Utilities is in the process of bench scale testing of thermal desorption of PFCs from the 6, 12, and 18 month old compost. In addition, Dalton Utilities has coordinated with the Georgia Environmental Protection Division's (EPD's) air protection branch and has mobilized a full-scale thermal desorption unit to our site for a full-scale field test. The full-scale field test started in November 2009, and has been on-going for 5 weeks. To date, we have collected and submitted 15 samples to a contract laboratory for analysis.

With regards to the Compost Use Review Report, Dalton Utilities is currently sampling certain locations where the finished compost was applied as a soil amendment and private drinking water wells in the immediate vicinity of this application, if any. To date, 22 locations where the compost was utilized as a soil amendment have been sampled and six private drinking water wells in the immediate vicinity of this application have been sampled. Dalton Utilities has submitted to EPA all the final analytical reports received to date for these sampling events. Dalton Utilities will submit any additional final analytical reports to EPA as required after receipt.

Additionally, as noted in our correspondence to Mr. Hom dated October 20, 2009, Dalton Utilities has partnered with the Sustainability Division of the Georgia Department of Natural Resources (DNR) and the University of Georgia (UGA) to conduct a survey to evaluate the current usage and potential levels of PFCs in the industrial discharges into our wastewater collection system. The finalized scope and memorandum of agreement which details the actions to be undertaken as part of this partnership were submitted to you on November 24, 2009. Currently, the sampling as part of this partnership is underway and scheduled to be completed in early January 2010. To date, 35 locations have been sampled and the samples submitted to a contract laboratory for analysis.

Further, as noted in our October 20, 2009, correspondence to Mr. Hom, and our correspondence to you dated November 24, 2009, Dalton Utilities has coordinated with the Georgia DNR and the United States Department of Agriculture Wildlife Services (USDA WS) to obtain and analyze blood and tissue samples of the wildlife on Dalton Utilities Land Application System (LAS). In accordance with this plan, the deer

sampling occurred on October 2 - 3, 2009, and the turkey sampling occurred on December 16, 2009. The results for the deer serum, muscle, and liver sampling are contained in Attachments B, C, D, and E, which are provided herein as bound reports titled MPI Research Analytical Report Numbers L0019345, L0019346, L0019345 revised 12/17/09, and L0019346 revised 12/17/09, respectively. Upon review, you will notice the quality control for several of the samples in Attachments B and C were outside of the contract laboratory's acceptable range; therefore, the samples were reanalyzed to obtain the appropriate percent recoveries. The results of the reanalysis are indicated in Attachments D and E.

As there are no EPA public health advisories or consumption guidelines, however, regarding the ingestion of deer and turkey meat or any other food items in relation to PFCs, Dalton Utilities requests EPA to study these toxicological effects and advise Dalton Utilities of the findings. Until such time that consumption guidelines are available, Dalton Utilities will not allow anyone to keep any internal organs from the deer obtained through the hunting operations on the Dalton Utilities LAS. The collected internal organs will be disposed of in a landfill.

As always, Dalton Utilities will update you as the projects discussed with you proceed. If you have any questions, please contact me at 706-529-1091 or [dcope@dutil.com](mailto:dcope@dutil.com).

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,

  
Don Cope  
President & CEO

Attachments (5)

c: Mr. Allen Barnes, Georgia Environmental Protection Division (cover letter only)  
Dr. Marlin Gottschalk, Sustainability Division Georgia Department of Natural Resources (cover letter only)  
Dr. Bert Langley, Georgia Environmental Protection Division (cover letter only)  
Lee A. DeHihns, Esq.